

EXHIBIT A



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

LICENSE No. VENEZUELA-EO13850-2019-363328-1

VENEZUELA SANCTIONS REGULATIONS

LICENSE AMENDMENT

Issued under the authority of one or more of 50 U.S.C. §§ 1601-51, 1701-06, Pub. L. 113-278, Executive Orders 13692, 13808, 13827, 13835, 13850, 13857, and 13884 and 31 C.F.R. Parts 501 and 591.

To: Refineria di Korsou N.V.
c/o Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, NW
Washington, DC 20036

Attn: Adam M. Smith

1. Based upon the request dated September 26, 2019 to the Office of Foreign Assets Control (the “Application”), and additional information available to the Office of Foreign Assets Control, the transactions described herein are hereby authorized.
2. This License is subject to the condition, among others, that the Licensee(s) comply with its terms and with all regulations, rulings, orders, and instructions issued under any of the authorities cited above.
3. This License **expires on December 31, 2020** and is not transferable. The transactions described in this License are subject to the authorities cited above and any regulations and rulings issued pursuant thereto. This License may be revoked or modified at any time. If this License was issued as a result of willful misrepresentation it may be declared void from the date of its issuance or from any other date.
4. This License does not authorize transactions prohibited by any law or regulation administered by the Office of Foreign Assets Control other than those listed above.
5. This License does not excuse the Licensee(s) from the need to comply with any law or regulation (including reporting requirements) administered by any other agency or the need to obtain any required authorization(s) from any other agency.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

By Nikole Thomas November 22, 2019
Nikole Thomas Date
Assistant Director for Licensing

Attention is directed to, *inter alia*, 18 U.S.C. § 1001, 50 U.S.C. § 1705, and Pub. L. 113-278, § 5(b)(2) for provisions relating to penalties.

SECTION I – AUTHORIZATION: Subject to the conditions and limitations stated herein, U.S. persons (the “Licensees”) are hereby authorized to engage in all transactions and activities ordinarily incident and necessary to the settlement of claims by Refineria di Korsou N.V. (RDK) and other Curaçao-based creditors of Petroleos de Venezuela, S.A. (“PdVSA”) and its designees, Refineria Isla (Curazao) S.A. and Refineria Isla Curaçao B.V. (collectively, “Isla”), arising from PdVSA and Isla’s operation of Curaçao’s oil refinery and terminal, and the wind-down of activities by RDK involving PdVSA or Isla arising from PdVSA and Isla’s operation of Curaçao’s oil refinery and terminal, including but not limited to the provision of financial services and the shipment, storage, handling, and sale of Venezuelan-origin petroleum and petroleum products.

SECTION II – CONDITIONS: The authorization in **SECTION 1** does not authorize any payments or transfers of funds to or for the benefit of PdVSA or Isla.

SECTION III – WARNINGS: **(a)** Except as authorized in **SECTION 1**, above, this License does not authorize the transfer of any blocked property, the debiting of any blocked account, the entry of any judgment or order that effects a transfer of blocked property, or the execution of any judgment against property blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F.R.

(b) Except as authorized in **SECTION 1**, above, this License does not authorize the transfer to or receipt of funds or other property, directly or indirectly, from any entity or individual whose property or interests in property are blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F.R.

(c) Any transfer of funds through the U.S. financial system pursuant to the authorization set forth above should reference the number of this License to avoid the rejection of the transfer.

SECTION IV – RECORDKEEPING & REPORTING REQUIREMENTS: **(a)** The Licensees are subject to the recordkeeping and reporting requirements of, *inter alia*, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain full and accurate records concerning the transactions undertaken pursuant to this License for a period of five years from the date of each transaction.

(b) No later than January 15, 2020, and every 30 days thereafter, RDK must submit a detailed report of all transactions engaged in pursuant to this License. The first report should describe the activities and transactions related to the winding down of dealings with PdVSA and Isla in advance of the December 31, 2019 expiration of PdVSA and Isla’s lease of the oil refinery and terminal in Curaçao, as well as the cessation of PdVSA and Isla’s roles as the operators of the oil refinery and terminal in Curacao.

(c) The reports required by **SECTION 4(b)** are to be mailed to: ofacreport@treasury.gov or Sanctions Compliance & Evaluation Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, N.W., Freedman’s Bank Building, Washington, D.C., 20220, and refer to this case no: **License No. VENEZUELA-EO13850-2019-363328-1**.

SECTION V – PRECEDENTIAL EFFECT: The authorization contained in this License is limited to the facts and circumstances specific to the Application.



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

LICENSE No. VENEZUELA-EO13850-2019-363328-2

VENEZUELA SANCTIONS REGULATIONS

LICENSE RENEWAL

Granted under the authority of one or more of 50 U.S.C. §§ 1601-51, 1701-06, Pub. L. 113-278, Executive Orders 13692, 13808, 13827, 13835, 13850, 13857, 13884, and 31 C.F.R. Parts 501 and 591.

To: Refineria di Korsou N.V.
c/o Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036

Attn: Adam M. Smith

1. Based upon the request dated October 12, 2020, on behalf of Refineria di Korsou N.V., to the Office of Foreign Assets Control (the “Application”), the transactions described herein are hereby authorized. This License supersedes VENEZUELA-EO13850-2019-363328-1 in all aspects.
2. This License is subject to the condition, among others, that the Licensee(s) comply with its terms and with all regulations, rulings, orders, and instructions issued under any of the authorities cited above.
3. This License **expires on the earlier of the completion of the authorized transaction(s) or December 31, 2021**, and is not transferable. The transactions described in this License are subject to the authorities cited above and any regulations and rulings issued pursuant thereto. This License may be revoked or modified at any time. If this License was issued as a result of willful misrepresentation it may be declared void from the date of its issuance or from any other date.
4. This License does not authorize transactions prohibited by any law or regulation administered by the Office of Foreign Assets Control other than those listed above.
5. This License does not excuse the Licensee(s) from the need to comply with any law or regulation (including reporting requirements) administered by any other agency or the need to obtain any required authorization(s) from any other agency.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

By _____
Mary Patricia Rasmussen December 30, 2020

Mary Patricia Rasmussen Date
Deputy Assistant Director for Licensing

Attention is directed to, *inter alia*, 18 U.S.C. § 1001, 50 U.S.C. § 1705, and Pub. L. 113-278, § 5(b)(2) for provisions relating to penalties.

LICENSE No. VENEZUELA-EO13850-2019-363328-2**Page 2 of 2**

SECTION I – AUTHORIZATION: Subject to the conditions and limitations stated herein, U.S. persons (the “Licensees”) are hereby authorized to engage in all transactions and activities ordinarily incident and necessary to the settlement of claims by Refineria di Korsou N.V. (RDK) and other Curaçao-based creditors of Petroleos de Venezuela, S.A. (PDVSA) and its designees, Refineria Isla (Curazao) S.A. and Refineria Isla Curaçao B.V. (collectively, “Isla”), arising from PDVSA and Isla’s operation of Curaçao’s oil refinery and terminal, and the wind-down of activities by RDK involving PDVSA or Isla arising from PDVSA and Isla’s operation of Curaçao’s oil refinery and terminal, including but not limited to the provision of financial services and the shipment, storage, handling, and sale of Venezuelan-origin petroleum and petroleum products, as described in the Application.

SECTION II – CONDITIONS: (a) The authorization in **SECTION I** does not authorize any payments or transfers of funds to or for the benefit of PDVSA or Isla.

(b) The authorization in **SECTION I** does not authorize payment in the form of Venezuelan-origin petroleum and petroleum products that are not already located on the island.

SECTION III – WARNINGS: (a) Except as authorized in **SECTION I**, above, this License does not authorize the transfer of any blocked property, the debiting of any blocked account, the entry of any judgment or order that effects a transfer of blocked property, or the execution of any judgment against property blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F.R.

(b) Except as authorized in **SECTION I**, above, this License does not authorize the transfer to or receipt of funds or other property, directly or indirectly, from any entity or individual whose property or interests in property are blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F.R.

(c) Any transfer of funds through the U.S. financial system pursuant to the authorization set forth above should reference the number of this License to avoid the rejection of the transfer.

SECTION IV – RECORDKEEPING & REPORTING REQUIREMENTS: (a) The Licensees are subject to the recordkeeping and reporting requirements of, *inter alia*, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain full and accurate records concerning the transactions undertaken pursuant to this License for a period of five years from the date of each transaction.

(b) No later than January 15, 2021, and every 30 days thereafter, RDK must submit a detailed report of all transactions engaged in pursuant to this License. The first report should describe the activities and transactions related to the winding down of dealings with PDVSA and Isla, as well as the cessation of PDVSA and Isla’s roles as the operators of the oil refinery and terminal in Curacao.

(c) The reports required by **SECTION IV(b)** are to be mailed to: Ofacreports@treasury.gov or Sanctions Compliance & Evaluation Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, N.W., Freedman’s Bank Building, Washington, D.C., 20220, and refer to this case no: **License No. VENEZUELA-EO13850-2019-363328-2**.

SECTION V – PRECEDENTIAL EFFECT: The authorization contained in this License is limited to the facts and circumstances specific to the Application.



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

LICENSE No. VENEZUELA-EO13850-2019-363328-3

VENEZUELA SANCTIONS REGULATIONS

LICENSE EXTENSION

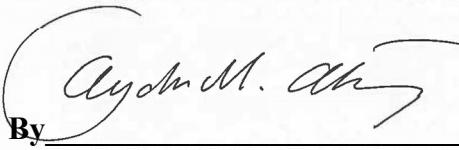
Issued under the authority of one or more of 50 U.S.C. §§ 1601-51, 1701-06, Pub. L. 113-278, Executive Orders 13692, 13808, 13827, 13835, 13850, 13857, 13884, and 31 C.F.R. Parts 501 and 591.

To: Refineria di Korsou N.V.
c/o Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036
Attn: Adam M. Smith, Esq.

1. Based upon the request dated November 18, 2021, on behalf of Refineria di Korsou N.V., to the Office of Foreign Assets Control (the “Application”), the transactions described herein are hereby authorized. This License supersedes and replaces License No. Venezuela-EO13850-2019-363328-2 in all respects.
2. This License is subject to the condition, among others, that the Licensee(s) comply with its terms and with all regulations, rulings, orders, and instructions issued under any of the authorities cited above.
3. This License **expires on the earlier of the completion of the authorized transaction(s) or December 31, 2022**, and is not transferable. The transactions described in this License are subject to the authorities cited above and any regulations and rulings issued pursuant thereto. This License may be revoked or modified at any time. If this License was issued as a result of willful misrepresentation it may be declared void from the date of its issuance or from any other date.
4. This License does not authorize transactions prohibited by any law or regulation administered by the Office of Foreign Assets Control other than those listed above.
5. This License does not excuse the Licensee(s) from the need to comply with any law or regulation (including reporting requirements) administered by any other agency or the need to obtain any required authorization(s) from any other agency.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL


By _____

December 30, 2021

Aydin M. Akgün
Chief, Licensing Division

Date _____

Attention is directed to, *inter alia*, 18 U.S.C. § 1001, 50 U.S.C. § 1705, and Pub. L. 113-278, § 5(b)(2) for provisions relating to penalties.

SECTION I – AUTHORIZATION: Subject to the conditions and limitations stated herein, U.S. persons (the “Licensees”) are hereby authorized to engage in all transactions and activities ordinarily incident and necessary to the settlement of claims by Refineria di Korsou N.V. (RDK) and other Curaçao-based creditors of Petroleos de Venezuela, S.A. (PDVSA) and its designees, Refineria Isla (Curazao) S.A. and Refineria Isla Curaçao B.V. (collectively, “Isla”), arising from PDVSA and Isla’s operation of Curaçao’s oil refinery and terminal, and the wind-down of activities by RDK involving PDVSA or Isla arising from PDVSA and Isla’s operation of Curaçao’s oil refinery and terminal, including but not limited to the provision of financial services and the shipment, storage, handling, and sale of Venezuelan-origin petroleum and petroleum products, as described in the Application.

SECTION II – CONDITIONS: (a) The authorization in **SECTION I** does not authorize any payments or transfers of funds to or for the benefit of PDVSA or Isla.

(b) The authorization in **SECTION I** does not authorize payment in the form of Venezuelan-origin petroleum and petroleum products that are not already located on the island.

SECTION III – WARNINGS: (a) Except as authorized in **SECTION I**, above, this License does not authorize the transfer of any blocked property, the debiting of any blocked account, the entry of any judgment or order that effects a transfer of blocked property, or the execution of any judgment against property blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F.R.

(b) Except as authorized in **SECTION I**, above, this License does not authorize the transfer to or receipt of funds or other property, directly or indirectly, from any entity or individual whose property or interests in property are blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F.R.

(c) Any transfer of funds through the U.S. financial system pursuant to the authorization set forth above should reference the number of this License to avoid the blocking or rejection of the transfer.

SECTION IV – RECORDKEEPING & REPORTING REQUIREMENTS: (a) The Licensees are subject to the recordkeeping and reporting requirements of, *inter alia*, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain full and accurate records concerning the transactions undertaken pursuant to this License for a period of five years from the date of each transaction.

(b) No later than January 15, 2022, and every 30 days thereafter, RDK must submit a detailed report of all transactions engaged in pursuant to this License. The first report should describe the activities and transactions related to the winding down of dealings with PDVSA and Isla, as well as the cessation of PDVSA and Isla’s roles as the operators of the oil refinery and terminal in Curacao.

(c) The reports required by **SECTION IV(b)** are to be mailed to: Ofacreports@treasury.gov or Sanctions Compliance & Evaluation Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, N.W., Freedman’s Bank Building, Washington, D.C., 20220, and refer to this case no: **License No. VENEZUELA-EO13850-2019-363328-3**.

SECTION IV – PRECEDENTIAL EFFECT: The authorization contained in this License is limited to the facts and circumstances specific to the Application.



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

LICENSE No. VENEZUELA-EO13850-2019-363328-4

VENEZUELA SANCTIONS REGULATIONS

LICENSE EXTENSION

Issued under the authority of one or more of 50 U.S.C. §§ 1601-51, 1701-06, Pub. L. 113-278, Executive Orders 13692, 13808, 13827, 13835, 13850, 13857, 13884, and 31 C.F.R. Parts 501 and 591.

To: Refineria di Korsou N.V.
c/o Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036

Attn: Adam M. Smith, Esq.

1. Based upon the request dated December 1, 2022, on behalf of Refineria di Korsou N.V., and information otherwise available to the Office of Foreign Assets Control (the “Application”), the transactions described herein are hereby authorized.
2. This License is subject to the condition, among others, that the Licensee(s) comply with its terms and with all regulations, rulings, orders, and instructions issued under any of the authorities cited above.
3. This License **expires on the earlier of the completion of the authorized transaction(s) or December 31, 2023**, and is not transferable. The transactions described in this License are subject to the authorities cited above and any regulations and rulings issued pursuant thereto. This License may be revoked or modified at any time. If this License was issued as a result of willful misrepresentation it may be declared void from the date of its issuance or from any other date.
4. This License does not authorize transactions prohibited by any law or regulation administered by the Office of Foreign Assets Control other than those listed above.
5. This License does not excuse the Licensee(s) from the need to comply with any law or regulation (including reporting requirements) administered by any other agency or the need to obtain any required authorization(s) from any other agency.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

December 30, 2022

By

Aydin M. Akgün
Chief, Licensing Division

Date

SECTION I – AUTHORIZATION: Subject to the conditions and limitations stated herein, U.S. persons (the “Licensees”) are hereby authorized to engage in all transactions and activities ordinarily incident and necessary to the settlement of claims by Refineria di Korsou N.V. (RDK) and other Curaçao-based creditors of Petróleos de Venezuela, S.A. (PdVSA) and its designees, Refineria Isla (Curazao) S.A. and Refineria Isla Curaçao B.V. (collectively, “Isla”), arising from PdVSA and Isla’s operation of Curaçao’s oil refinery and terminal, and the wind-down of activities by RDK involving PdVSA or Isla arising from PdVSA and Isla’s operation of Curaçao’s oil refinery and terminal, including but not limited to the provision of financial services and the shipment, storage, handling, and sale of Venezuelan-origin petroleum and petroleum products, as described in the Application.

SECTION II – CONDITIONS: (a) The authorization in **SECTION I** does not authorize any payments or transfers of funds to or for the benefit of PdVSA or Isla.

(b) The authorization in **SECTION I** does not authorize payment in the form of Venezuelan-origin petroleum and petroleum products that are not already located on the island as of December 30, 2020.

SECTION III – WARNINGS: (a) Except as authorized in **SECTION I**, this License does not authorize the transfer of any blocked property, the debiting of any blocked account, the entry of any judgment or order that effects a transfer of blocked property, or the execution of any judgment against property blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F.R.

(b) Except as authorized in **SECTION I**, this License does not authorize the transfer to or receipt of funds or other property, directly or indirectly, from any entity or individual whose property or interests in property are blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F.R.

(c) Any transfer of funds through the U.S. financial system pursuant to the authorization set forth above should reference the number of this License to avoid the blocking or rejection of the transfer.

SECTION IV – RECORDKEEPING & REPORTING REQUIREMENTS: (a) The Licensees are subject to the recordkeeping and reporting requirements of, *inter alia*, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain full and accurate records concerning the transactions undertaken pursuant to this License for a period of five years from the date of each transaction.

(b) No later than January 15, 2023, and every 30 days thereafter, RDK must submit a detailed report of all transactions engaged in pursuant to this License. The first report should describe the activities and transactions related to the winding down of dealings with PdVSA and Isla, as well as the cessation of PdVSA and Isla’s roles as the operators of the oil refinery and terminal in Curacao.

(c) The reports required by **SECTION IV(b)** are to be mailed to: Ofacreport@treasury.gov or Sanctions Compliance & Evaluation Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, N.W., Freedman’s Bank Building, Washington, D.C., 20220, and refer to this case number: **License No. VENEZUELA-EO13850-2019-3363328-4**.

SECTION V – PRECEDENTIAL EFFECT: The authorization contained in this License is limited to the facts and circumstances specific to the Application.
